

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Fatmah Khalefah,)
)
Plaintiff,) C.A. No: 2:22-cv-03490-DCN
)
vs.)
)
Raising Cane's Restaurants, LLC d/b/a) **NOTICE OF REMOVAL**
Raising Cane's Chicken Fingers and)
Raising Cane's USA, LLC d/b/a Raising)
Cane's Chicken Fingers,)
)
Defendants.)
)

Defendants Raising Cane's Restaurants, LLC d/b/a Raising Cane's Chicken Fingers and Raising Cane's USA, LLC d/b/a Raising Cane's Chicken Fingers ("Raising Cane"), through its counsel Henry D. McMaster, Jr., Andrew T. Smith and Christian Stegmaier of Collins & Lacy, P.C., files this Notice of Removal in the above-captioned case to the United States District Court for the District of South Carolina, Charleston Division pursuant to 28 U.S.C. §§ 1332, 1441, and 1446.

Defendants would respectfully show unto this Honorable Court:

1. The above-entitled action was brought in the Charleston County Court of Common Pleas by Plaintiff to recover from Defendants a judgment for actual and punitive damages for injuries that could be characterized as substantial, together with the cost and fees of this action. By virtue of these allegations, Defendants aver the jurisdictional threshold has been satisfied.
2. Plaintiff's Complaint is silent as to the amount in controversy. Defendants are informed by Plaintiff's counsel that Plaintiff would not stipulate to the fact that damages do not exceed

\$75,000.00. Based upon this information, Defendants submit there is sufficient evidence that the amount in controversy exceeds the jurisdictional threshold for removal.

3. This action was commenced by the service of a Summons and Complaint against Defendants, which was received by Defendant's agent via Certified Mail on September 9, 2022. The deadline to remove this matter is October 10, 2022.
4. Defendant Raising Cane's Restaurants, LLC d/b/a Raising Cane's Chicken Fingers is a foreign corporation. Defendant's state of incorporation is Louisiana. Defendant's principal place of business is Louisiana. Specifically, Defendant's corporate headquarters are located in Baton Rouge, Louisiana.
5. Defendant Raising Cane's USA, LLC d/b/a Raising Cane's Chicken Fingers is a foreign corporation. Defendant's state of incorporation is Louisiana. Defendant's principal place of business is Louisiana. Specifically, Defendant's corporate headquarters are located in Baton Rouge, Louisiana.
6. Defendants Raising Cane files herewith copies of all process, pleadings, and order served upon them in this action as part of this notice.
7. Defendants Raising Cane will file a copy of this Notice of Removal with the Clerk of Court for Charleston County, South Carolina, and will serve a copy upon counsel for Plaintiff.

WHEREFORE, Defendants Raising Cane pray this Honorable Court accept this Notice of Removal that is being filed and that this Honorable Court take jurisdiction of the above-entitled case and all further proceedings in said cause in the Court of Common Pleas, County of Charleston, State of South Carolina be stayed.

[SIGNATURE PAGE TO FOLLOW]

Respectfully submitted,
COLLINS & LACY, P.C.

By: s/Andrew T. Smith
HENRY D. MCMASTER, JR.
Fed ID No.: 13711
hmcmaster@collinsandlacy.com
ANDREW T. SMITH
Fed ID No.: 13814
asmith@collinsandlacy.com
CHRISTIAN STEGMAIER
Fed ID No.: 8007
cstegmaier@collinsandlacy.com
Post Office Box 12487
Columbia, SC 29211
803.256.2660 (voice)
803.771.4484 (fax)

ATTORNEYS FOR DEFENDANTS
RAISING CANE'S RESTUARANTS, LLC
D/B/A RAISING CANE'S CHICKEN
FINGERS AND RAISING CANE'S USA,
LLC D/B/A RAISING CANE'S CHICKEN
FINGERS

NOTICE OF REMOVAL

Columbia, South Carolina
October 10, 2022